



PAUL R. LEPAGE
GOVERNOR

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



AVERY T. DAY
ACTING COMMISSIONER

**Margaret Lee d/b/a
Lee's Redi Mix Concrete
Penobscot County
East Millinocket, Maine
A-169-71-J-A**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

FINDINGS OF FACT

After review of the air emission license amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Margaret Lee d/b/a Lee's Redi Mix Concrete (Lee's) of East Millinocket, Maine was issued Air Emission License A-169-71-I-R/A on May 24, 2013, permitting the operation of emission sources associated with their concrete batch plant and portable crushed stone and gravel facility.

Lee's has requested an amendment to their license in order to remove the Concrete Batch Plant currently listed on their license and to add Concrete Batch Plant #2 to the license to replace it.

The equipment addressed in this license is located at 157 Main Road, East Millinocket, Maine.

B. Emission Equipment

The following equipment is addressed in this Air Emission License:

Concrete Plant

<u>Equipment</u>	<u>Production Rate (cubic yards/hour)</u>	<u>Control Device</u>
Concrete Batch Plant #2*	60	baghouse

*New to this license

C. Application Classification

The modification of a minor source is considered a major or minor modification based on whether or not expected emission increases exceed the "Significant Emission" levels as defined in the Department's *Definitions Regulation*, 06-096 CMR 100 (as amended). The emission increases are determined by subtracting the current licensed annual emissions preceding the modification from the maximum future licensed annual emissions, as follows:

<u>Pollutant</u>	<u>Current License (TPY)</u>	<u>Future License (TPY)</u>	<u>Net Change (TPY)</u>	<u>Significant Emission Levels</u>
PM	0.5	0.5	-	100
PM ₁₀	0.5	0.5	-	100
SO ₂	0.01	0.01	-	100
NO _x	19.9	19.9	-	100
CO	4.3	4.3	-	100
VOC	1.6	1.6	-	50
CO ₂ e	<100,000	<100,000	-	100,000

This modification is determined to be a minor modification and has been processed as such.

II. **BEST PRACTICAL TREATMENT**

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 CMR 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Concrete Batch Plant #2

Concrete Batch Plant #2 is rated at 60 cubic yards/hour and includes one silo.

To meet the requirements of BACT for control of particulate matter (PM) emissions from the Concrete Batch Plant #2 cement silo, particulate emissions shall be vented through a baghouse maintained for 99% removal efficiency.

Visible emissions from the cement silo baghouse are limited to no greater than 10% opacity on a six (6) minute block average basis except for no more than one (1) six (6) minute block average in a 1-hour period. Lee's shall take corrective action if visible emissions from the baghouses exceed 5% opacity.

All components of Concrete Batch Plant #2 shall be maintained so as to prevent PM leaks. Visible emissions from concrete batching operations shall not exceed 20% opacity on a six (6) minute block average basis except for no more than one (1) six (6) minute block average in a 1-hour period.

C. Annual Emissions

This amendment does not change the total annual licensed emissions from Lee's.

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source shall be determined by the Department on a case-by case basis. In accordance with 06-096 CMR 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

<u>Pollutant</u>	<u>Tons/Year</u>
PM ₁₀	25
SO ₂	50
NO _x	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

ORDER

Based on the above Findings and subject to conditions listed below the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

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The Department hereby grants Air Emission License A-169-71-J-A, subject to the conditions found in Air Emission License A-169-71-I-R/A and the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

SPECIFIC CONDITIONS

Specific Condition (16) from Air Emission License A-169-71-I-R/A will be replaced by the following:

(16) Concrete Batch Plant #2

- A. Particulate emissions from the Concrete Batch Plant #2 cement silo shall be vented through a baghouse and all components of Concrete Batch Plant #2 shall be maintained so as to prevent PM leaks. [06-096 CMR 115, BPT]
- B. To document maintenance of the Concrete Batch Plant #2 cement silo baghouse, the licensee shall keep a maintenance record recording the date and location of all bag failures as well as all routine maintenance. The maintenance record shall be kept on-site at the concrete batch plant location. [06-096 CMR 115, BPT]
- C. Opacity from the Concrete Batch Plant #2 cement silo baghouse is limited to no greater than 10% on a 6-minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. Lee's shall take corrective action if visible emissions from the baghouse exceed 5% opacity. [06-096 CMR 101]

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D. PM emissions from the concrete batching operation shall be controlled so as to prevent visible emissions in excess of 20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]

DONE AND DATED IN AUGUSTA, MAINE THIS 26 DAY OF October, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Mara Allen Robert Carr for
AVERY T. DAY, ACTING COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-169-71-I-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 9/30/2015

Date of application acceptance: 10/2/2015

Date filed with the Board of Environmental Protection:

This Order prepared by Jonathan E. Rice, Bureau of Air Quality.

